

# **EXHIBIT E**

## Ament-Stone, Nathaniel

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**From:** Timothy G. Parilla <tgparilla@thepmlawfirm.com>  
**Sent:** Monday, May 18, 2020 8:37 AM  
**To:** Ament-Stone, Nathaniel; 'Walter W. Noss'; Jill Manning; Lauer, Eliot; Semmelman, Jacques  
**Cc:** Derek Brandt; Allan Steyer; Stephanie Hackett; Todd Schneider; Kyle Bates; Robert J Palmersheim; Anand C. Mathew; Mrkonic, Matthew G.  
**Subject:** RE: External: RE: Ali - Discovery from GIAG and Pacorini Vliess  
**Attachments:** 2020-05-18 - GIAG AW Vliess Discovery - Ps' Proposal - 4812-0475-5132.docx

**\*\*\*EXTERNAL EMAIL\*\*\***

Counsel,

Attached please find our updated discovery proposal. Please let us know if you would like to discuss.

Best regards,



**Timothy G. Parilla**

Associate

PALMERSHEIM & MATHEW LLP

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Chicago, Illinois 60654

Tel: 312.705.3627 | Fax: 312.878.2890

[web](#) | [vCard](#) | [LinkedIn](#)

**Confidentiality Note:** This email may contain confidential and/or private information. If you received this email in error please delete and notify sender.

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**From:** Ament-Stone, Nathaniel  
**Sent:** Sunday, May 17, 2020 2:06 PM  
**To:** 'Walter W. Noss'; Timothy G. Parilla; Jill Manning; Lauer, Eliot; Semmelman, Jacques  
**Cc:** Derek Brandt; Allan Steyer; Stephanie Hackett; Todd Schneider; Kyle Bates; Robert J Palmersheim; Anand C. Mathew; Mrkonic, Matthew G.  
**Subject:** RE: External: RE: Ali - Discovery from GIAG and Pacorini Vliess

Counsel:

We are available to meet and confer at 8:30 EDT tonight.

All the best,  
Nathaniel

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**From:** Walter W. Noss [<mailto:wnooss@scott-scott.com>]  
**Sent:** Sunday, May 17, 2020 8:58 AM  
**To:** Timothy G. Parilla; Ament-Su looking for?tone, Nathaniel; Jill Manning; Lauer, Eliot; Semmelman,

## **DOCUMENTS**

### **Custodians:**

Gary Fegel  
Robin Scheiner  
Simon Yntema

### **Time Frame:**

April 1, 2010 to December 31, 2014

### **Search Terms:**

#### **EMAIL DOMAIN PARAMETERS**

*Include communications with*

**(1) any of the following email domains;**

- glencore-us.com
- gs.com
- henrybath.com
- jpmorgan.com
- metroftz.com
- [pacoriniusa.com](#)
- [bap.uk.com](#)
- [redkitemgmt.com](#)
- [rkcapital.co.uk](#)
- [db.com](#)
- [steinweg.com](#)

**(2) email domains for any affiliate of Goldman Sachs, Henry Bath, JPMorgan, and Metro (if known);**

**(3) internal GIAG or AW Vlissingen emails referring to communications with Goldman Sachs, Henry Bath, JPMorgan, ~~or~~ Metro, [Red Kite, Steinweg, or Deutsche Bank](#);**

**[\(4\) internal GIAG or AW Vlissingen emails relating to queues at Detroit or Vlissingen;](#)  
and**

**[\(45\)](#) Emails sent TO (@platts.com), (@fastmarkets.com), or (@metalbulletin.com)**

#### **KEYWORDS**

***Within* email domain parameters (1)-([34](#)), search for any of the following strings:**

- bottleneck\* OR “bottle neck” OR “bottle-neck”
- “critical mass” OR stockpile
- (cue or que\* or q) w/5 (Det\* OR Vliss\* OR Flushing)
- cancel\* w/5 (Det\* OR Vliss\* OR Flushing OR que\* OR q OR cue)
- (support\* OR increas\* OR squeez\* OR high\* OR pressur\* OR inflat\* OR que\* OR impact\*) w/5 premium\*
- (block\* OR clog\* OR manag\*) w/5 (que\* OR q OR cue\*)
- swap w/10 (Det\* OR Vliss\* OR Flushing)
- (rewarrant\* OR re-warrant\*) w/10 (Det\* OR Vliss\* OR Flushing)
- boomerang\*
- “LOCKUP REPORT”
- “ANNEX DEAL”
- “under Pacorini” w/10 “instruction”
- “Vlissingen” w/10 (“calc” OR “calculation”)
- “Detroit” w/10 (“calc” OR “calculation”)
- “locked” AND “floating”

### **DEPOSITIONS**

Robin Scheiner, individually and as the Rule 30(b)(6) designee

### **DATA**

#### **To Pacorini (Vlissingen)**

1. Data sufficient to show your end-of-day (or if not tracked daily, then in the most specific form available) inventory of primary aluminum stored at Pacorini (Vlissingen) locations between January 1, 2010 to December 31, 2014.
  - a. Aluminum held on-warrant at all locations broken down on a location-by-location basis; and
  - b. Aluminum held off-warrant at all locations broken down on a location-by-location basis.
2. Data sufficient to show all payments and/or incentive agreements or any other agreements that were paid and/or agreed to induce the storage of aluminum or to extend the storage period of aluminum at Pacorini (Vlissingen) locations between January 1, 2010 to December 31, 2014.

#### **To Glencore International AG**

1. Data sufficient to show your end-of-day (or if not tracked daily, then in the most specific form available) primary aluminum holdings at LME warehouses ~~in Detroit and~~

~~Vlissingen~~ between January 1, 2010 to December 31, 2014, excluding Asia.

2. Data sufficient to show your end-of-day (or if not tracked daily, then in the most specific form available) primary aluminum holdings at non-LME warehouses, i.e., off-warrant, ~~in Detroit and Vlissingen~~ between January 1, 2010 and December 31, 2014, excluding Asia.

~~2.3.~~ Data sufficient to show your purchases and sales of primary aluminum between January 1, 2010 and December 31, 2014, including volume, price, and any premiums, excluding Asia<sup>1</sup>.

### **ADDITIONAL**

Provide Rule 26(a) disclosures for by GIAG and PVliss.

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<sup>1</sup> For purposes of these Data Requests, Russia is not considered as part of Asia.